FILED BY KS D.C.

Feb 17, 2022

ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - Minmi

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:22 Cr39 CEH-TEW

46 U.S.C. § 70503(a) 46 U.S.C. § 70506(a) and (b)

CARLOS MERO MERO, SIMON ARCENTALES CASTRO, and ELVIS EDIEL LOPEZ BATRES

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date and continuing through and including on or about January 7, 2022, in the Middle District of Florida, and elsewhere, the defendants,

CARLOS MERO MERO, SIMON ARCENTALES CASTRO, and ELVIS EDIEL LOPEZ BATRES,

did knowingly and intentionally conspire with other persons, both known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance, which violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, while upon the high seas on board a vessel subject to the jurisdiction of the United States, and is therefore punished under 46 U.S.C. §§ 70503(a) and 70506(a) and (b).

All in violation of 46 U.S.C. §§ 70503(a) and 70506(a) and (b), and 21 U.S.C. § 960(b)(1)(B)(ii).

COUNT TWO

Beginning on an unknown date and continuing through and including on or about January 7, 2022, in the Middle District of Florida, and elsewhere, the defendants,

CARLOS MERO MERO, SIMON ARCENTALES CASTRO, and ELVIS EDIEL LOPEZ BATRES,

did knowingly and intentionally possess with intent to distribute a controlled substance, which violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, while upon the high seas on board a vessel subject to the jurisdiction of the United States, and is therefore punished under 46 U.S.C. §§ 70503(a) and 70506(a).

All in violation of 46 U.S.C. §§ 70503(a) and 70506(a), 21 U.S.C. § 960(b)(1)(B)(ii), and 18 U.S.C. § 2.

FORFEITURE

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging

forfeitures pursuant to the provisions of 21 U.S.C. §§ 853 and 881, 46 U.S.C. § 70507, and 28 U.S.C. § 2461(c).

2. Upon their conviction of any of the violations alleged in Counts One or Two of this Indictment, in violation of 46 U.S.C. § 70503, the defendants,

CARLOS MERO MERO, SIMON ARCENTALES CASTRO, and ELVIS EDIEL LOPEZ BATRES,

shall forfeit to the United States, pursuant to 46 U.S.C. § 70507, 21 U.S.C. § 881(a), and 28 U.S.C. § 2461(c), any and all property described in 21 U.S.C. § 881(a)(1) through (11) that was used or intended for use to commit, or facilitate the commission of, such offenses.

3. Upon their conviction of any of the violations alleged in Counts One or Two of this Indictment, in violation of 21 U.S.C. § 960, the defendants,

CARLOS MERO MERO, SIMON ARCENTALES CASTRO, and ELVIS EDIEL LOPEZ BATRES,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

- 4. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with a third party;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property, which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provision of 21 U.S.C. § 853(p), directly and as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

Foreperson

ROGER B. HANDBERG United States Attorney

By:

Lauren N. Stoia

Assistant United States Attorney

By:

Joseph K. Ruddy

Assistant United States Attorney

Chief, Transnational Organized Crime Section

| FORM OBD-34 January 22 | No. | |
|---------------------------|---|--|
| | UNITED STATES DISTRICT COURT Middle District of Florida Tampa Division | |
| | THE UNITED STATES OF AMERICA | |
| | vs. | |
| | CARLOS MERO MERO, SIMON ARCENTALES CASTRO, and ELVIS EDIEL LOPEZ BATRES | |
| | INDICTMENT Violations: 46 U.S.C. §§ 70503(a) and 70506(a) & (b) | |
| | A true bill, Foreperson | |
| | Filed in open court this 27th day of January 2022. | |
| | Clerk | |
| | Bail \$ | |

UNITED STATES DISTRICT COURT

for the Middle District of Florida United States of America Case No. 8:22 CY39 CE Carlos Mero Mero Defendant ARREST WARRANT To: Any authorized law enforcement officer YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) Carlos Mero Mero who is accused of an offense or violation based on the following document filed with the court: Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint Probation Violation Petition Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court This offense is briefly described as follows: Conspiracy with intent to distribute five (5) kilograms or more of cocaine while on board a vessel subject to the jurisdiction of the United States, and possession with intent to distribute five (5) kilograms or more of cocaine, while on board a vessel subject to the jurisdiction of the United States In violation of: 46 U.S.C. §§ 70503(a) and 70506(a) and (b) City and state: Tampa, Florida ELIZABETH WARREN, Clerk, United States District Court Printed name and title Return This warrant was received on (date) , and the person was arrested on (date) at (city and state) Date: Arresting officer's signature Printed name and title

UNITED STATES DISTRICT COURT for the Middle District of Florida United States of America Case No. 8:22 Cr 39 CEH-+6 Simon Arcentales Castro Defendant ARREST WARRANT To: Any authorized law enforcement officer YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) Simon Arcentales Castro who is accused of an offense or violation based on the following document filed with the court: **▼** Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court This offense is briefly described as follows: Conspiracy with intent to distribute five (5) kilograms or more of cocaine while on board a vessel subject to the jurisdiction of the United States, and possession with intent to distribute five (5) kilograms or more of cocaine, while on board a vessel subject to the jurisdiction of the United States. In violation of: 46 U.S.C. §§ 70503(a) and 70506(a) and (b) City and state: Tampa, Florida ELIZABETH WARREN, Clerk, United States District Court Printed name and title Return This warrant was received on (date) , and the person was arrested on (date) at (city and state) Date: Arresting officer's signature

Printed name and title

| United S | STATES I | DISTRICT COURT | | | |
|---|------------------------------------|--|---|--|--|
| | for t | the | noth | | |
| | Middle Distr | ict of Florida | 9,10 | | |
| | | | | | |
| United States of America | | - | | | |
| v. Elvis Ediel Lopez Batres |) | Case No. 8:22 Cr 39 | (EH-TEN | | |
| |) | | | | |
| Defendant | - | | 18 | | |
| ARREST WARRANT | | | | | |
| To: Any authorized law enforcement officer | | | | | |
| YOU ARE COMMANDED to arrest and | bring before a | United States magistrate judge witho | uit unnecessary delay | | |
| (name of person to be arrested) Elvis Ediel Lopez Bati | | Janes magistrate juage | at difficeessary deray | | |
| who is accused of an offense or violation based on | | document filed with the court: | , | | |
| ✓ Indictment □ Superseding Indictment | | | | | |
| 1 3 | ☐ Informat | 1 8 | ☐ Complaint | | |
| This offense is briefly described as follows: | d Release Viola | ation Petition | Order of the Court | | |
| Conspiracy with intent to distribute five (5) kilogra of the United States, and possession with intent to subject to the jurisdiction of the United States. | ms or more of o distribute five | cocaine while on board a vessel subj ভ (5) kilograms or more of cocaine, wh | ect to the jurisdiction nile on board a vessel | | |
| In violation of: 46 U.S.C. §§ 70503(a) and 70506(a) | a) and (b) | | | | |
| 33 | a) ana (2) | | | | |
| | | | | | |
| Date: 128 2022 | | Clahon | 1 | | |
| / | · · | Issuing officer's signal | ture | | |
| City and state: Tampa, Florida | | ELIZADETH WADDEN Clark Limited | | | |
| | | ELIZABETH WARREN, Clerk, United Printed name and tit. | | | |
| | i . | | 76 | | |
| | Retur | ·n | | | |
| This warrant was received on (date) | , | , and the person was arrested on (date) | | | |
| / | | 3.7 | | | |
| Date: | | | | | |
| | _ | Arresting officer's signa | ature | | |
| | | | | | |
| (| | Printed name and titl | le | | |